

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ANDRE BISASOR,
Plaintiff,

v.

CRAIG S. DONAIS;
RUSSELL F. HILLIARD;
DONAIS LAW OFFICES, PLLC;
UPTON & HATFIELD, LLP;
and MARY K. DONAIS,
Defendants.

Case No. 1:23-CV-11313

**PLAINTIFF'S [EMERGENCY] MOTION TO EXTEND TIME TO FILE OPPOSITIONS TO
MOTION TO DISMISS**

1. Now comes the plaintiff and asks the court to on an emergency basis allow an extension of time to file oppositions to motions to dismiss or in the alternative to split into parts the oppositions to motions to dismiss to address the anti-slapp defense. Grounds are as follows.

REQUEST FOR EXTENSION OF TIME

2. My oppositions to the motions to dismiss in this case are currently due on Monday July 17, 2023.
3. I have had some challenges and unexpected issues that has set me back in my ability to get everything done by Monday July 17, 2023 (these include a combination of personal matters including medical, and other matters pertaining to other court cases that I am involved that have obstructed my time and that have hampered me¹). I will be able to complete the motion to remand by July 17, 2023 but not the oppositions to the motions to dismiss which are way more complicated including antislapp claims by the defendants.
4. I would need only a few more days to the end of the week next week to get everything done (i.e., until Friday July 21, 2023, which is only 4 more days).
5. This is a modest/reasonable/brief extension of time of 4 additional days to the end of the week.
6. No party will be prejudiced by this brief extension of only 4 days.

ALTERNATIVE MODIFIED REQUEST

7. In the alternative, because the defendants included an antislapp claim, in the body of their motions to dismiss (in addition to other defenses of personal jurisdiction and improper venue under Rule 12B, or other defenses such as litigation privilege and spousal disqualification), it has created complications because the antislapp is its own "beast" so to speak, with a separate statute and rule governing it.
8. The anti-slapp defense carry very complex and serious ramifications that is not easy for a pro se plaintiff to properly deal with it without adequate time to prepare, to research the issues and case law.

¹ I can provide further detail including medical records if it so pleases the court, but I would do so under seal. I can also provide further details regarding the events and occurrences with other court cases that have squeezed my time and availability, if necessary for the court.

9. I am requesting in the alternative that I be allowed to split my oppositions into two, one opposition to address the regular defenses under Rule 12B, etc., and the other to address the antislapp.
10. And further, in the alternative, I ask the court for an extension of time to file the opposition part dealing with the antislapp only, to end of next week Friday July 21, 2023, while still providing the first part of the opposition dealing with rule 12B on Monday July 17, 2023.
11. Although I prefer a total extension on the entire opposition due, I am willing to still try to meet at least part of it by Monday July 17, 2023, if that would be treated as more reasonable by the court.
12. I believe this is an eminently reasonable request for relief as outlined above.

CONCLUSION

13. I have sought to confer with defendants' counsel and defendants' counsel has not assented to my request for an extension of time to file the oppositions to the motion to dismiss..
14. This is being filed as an emergency because the deadline is Monday July 17, 2023 which is in 3 calendar days (including the weekend) from today, or in one business day from today.
15. Accordingly, I respectfully request that the Court allow this emergency motion.

Respectfully submitted,
Andre Bisasor
/s/andre bisasor
679 Washington Street, Suite # 8206
Attleboro, MA 02703

Date: July 14, 2023

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was or will be served to the parties in this case via the court's electronic filing/service system.

/s/andre bisasor
Andre Bisasor
679 Washington Street, Suite # 8-206
Attleboro, MA 02703

